

JONATHAN ROSENBERG, PLLC
137 Court Street, Fl. 2, Brooklyn, NY 11201
Tel: (718) 715-4845 | Fax: (718) 797-1855
Email: jonathan@rosenbergpllc.com

April 20, 2020

MEMO ENDORSED

HON. EDGARDO RAMOS
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, N.Y. 10007

Re: ***USA v. Luis Parrales, et al.***
1:19-cr-00663-ER

The application is ☒ granted
_____ denied



Edgardo Ramos, U.S.D.J

Dated: 4/28/2020

New York, New York

Your Honor:

My office represents the above-named defendant, Luis Parrales. On or about April 17, 2020, pretrial services was informed that Mr. Parrales would need to stay overnight in Pennsylvania during some of his legitimate work trips to the area, and consented to overnight stays up until May 17, 2020 subject to approval of the Court. Pretrial services informed me that Mr. Parrales has been in constant communication with their office and was continually providing them substantive updates on his work assignments, including paperwork showing outlining the nature of specific delivery jobs.

The defendant respectfully asks this Court to permit the defendant to stay overnight in Pennsylvania in the course of his legitimate work. As it stands, the defendant is permitted to travel to Pennsylvania as part of his work. The defendant represents to my office that he will not be able to continue some of his work -- specifically, deliveries for Amazon.com -- without being able to stay overnight in Pennsylvania when working.

The government does not oppose this application.

Respectfully submitted,



Jonathan Rosenberg
137 Court Street, Fl. 2
Brooklyn, N.Y. 11201
(718) 715-4845
Attorney for Luis Parrales

cc: Mr. Nicholas Chiuchiolo
Assistant U.S. Attorney
United States Attorney's Office
Southern District of New York